

Exhibit A

AFFIDAVIT

I, Kye Meadows, being duly sworn, states as follows:

1. I am a Task Force Office (TFO) of the Drug Enforcement Administration (“DEA”), United States Department of Justice, and have been so employed for approximately six years.

2. This affidavit is submitted in support of the forfeiture of the following property (“the defendant currency”): *One Hundred Thirty-One Thousand Seven Hundred Twenty Dollars (\$131,720.00) in United States Currency, more particularly described as follows:*

- a. Fifty-Nine Thousand Nine Hundred Twenty Dollars (\$59,920.00) in United States Currency seized from Joseph Zargar AKA Shahriar Joseph Zargar; and,*
- b. Seventy-One Thousand Eight Hundred Dollars (\$71,800.00) in United States Currency seized from Arthur Artoon Livakani.*

3. On or about October 3, 2023, the Drug Enforcement Administration (DEA) Memphis Resident Office (MRO) received information from Task Force Officer (TFO) Eli Sautter of the Cincinnati, Ohio DEA Office. TFO Sautter provided information from a confidential source (CS) related to Joseph ZARGAR aka Shahriar Joseph Zargar and Arthur Artoon LIVASKANI. Joseph ZARGAR and LIVASKANI flew into Memphis, Tennessee from Los Angeles, California on or about October 3, 2023 and were scheduled to fly out of Memphis and back to Los Angeles the next day, on or about October 4, 2023.

4. On or about October 4, 2023, Joseph ZARGAR and Arthur LIVASKANI went through the Memphis International Airport (MIA) security screening process with their carry-on luggage. TFOs identified themselves by showing DEA credentials to ZARGAR and LIVASKANI as they exited the security checkpoint. TFOs asked ZARGAR and LIVASKANI if they would agree to answering a few questions, to which both stated that they did not mind.

5. TFOs along with DEA Group Supervisor (GS) Bret Simonsen conducted

consensual interviews with Joseph ZARGAR and LIVASKANI. TFO Hoing asked Joseph ZARGAR if he was in possession of any large amounts of cash to which he stated he had \$60,000.00 U.S. currency in his brown carry-on suitcase. TFOs Hoing and Meadows asked Joseph ZARGAR for consent to look inside of his carry-on and received verbal consent. Inside of the carry-on, TFOs recovered a zip lock bag containing an undetermined amount of U.S. currency that was rubber banded and bundled. Joseph ZARGAR stated that he had gotten the currency from his bank account in Los Angeles, California before traveling to Memphis.

6. TFOs asked Joseph ZARGAR about his occupation to which he stated that he owns several ATMs and sells cars for a living. Joseph ZARGAR could not and would not provide a legitimate business or proof of employment. When Joseph ZARGAR was asked his reason for coming to Memphis for one day, Joseph ZARGAR stated that he was in Memphis to purchase a black BMW. ZARGAR also stated that the vehicle was not purchased because it had rough, small dents and scratches. Joseph ZARGAR was unable to provide the website, text messages, or pictures related to the sale of the vehicle in Memphis.

7. TFO Maxwell asked LIVASKANI for consent to look inside of his black carry-on suitcase and received verbal consent. Inside the carry-on, TFOs recovered a blue and white pouch containing an undetermined amount of U.S. currency that was rubber banded and bundled. TFOs asked LIVASKANI how much currency he had in the blue and white pouch located inside of the black carry-on and he stated he had \$68,000.00. LIVASKANI further stated that the undetermined amount of currency was for Joseph ZARGAR to purchase the vehicle and that he had no interest in the currency. LIVASKANI denied ownership of the currency and stated that all of the currency that the TFOs located belonged to Joseph ZARGAR.

8. TFO Maxwell observed LIVASKANI become nervous and started breathing

heavily. TFO Maxwell asked LIVASKANI about his occupation and he advised home health care, but LIVASKANI would not provide a business name. TFO Maxwell asked LIVASKANI his reason for coming to Memphis for one day. LIVASKANI stated that he and Joseph ZARGAR came to Memphis to purchase a BMW M3 car. When asked if LIVASKANI purchased the vehicle, LIVASKANI stated that the vehicle's mileage was not as represented in the online or internet advertisement. LIVASKANI also stated that he was only accompanying Joseph ZARGAR for the vehicle purchase.

9. Joseph ZARGAR provided to GS Simonsen phone number, 901-517-2432, as the alleged individual selling the BMW M3 car. TFO Meadows called 901-517-2432 and the individual denied having a black BMW, or any vehicles, for sale.

10. DEA investigation corroborated that a suspected drug trafficker drove Joseph ZARGAR and LIVASKANI to the Memphis Airport on or about October 4, 2023.

11. Due to inconsistencies in Joseph ZARGAR and LIVASKANI's explanations combined with Joseph ZARGAR's narcotics history, Joseph ZARGAR and LIVASKANI were relocated to the MIA Police sub-station for further investigation.

12. At the sub-station, Joseph ZARGAR and LIVASKANI both signed the consent to search forms for their cell phones. During an initial visual search of Joseph ZARGAR and LIVASKANI's iPhones, both phones contained photos of large quantities of marijuana, coded narcotic notes, ledgers of different marijuana strains and prices, and also ledgers of people that owed money to them.

13. TFO Maxwell explained to Joseph ZARGAR that the DEA was seizing for forfeiture the undetermined amount of currency that was rubber banded and bundled for forfeiture. TFO Maxwell seized the currency on the theory of drug trafficking proceeds.

14. TFO Maxwell then spoke with LIVASKANI and explained that the DEA was seizing for forfeiture the currency that was rubber banded and bundled. TFO Maxwell seized for forfeiture the currency on the theory of drug trafficking proceeds.

15. On or about October 4, 2023, TFO C. Schuamburg and his narcotic detection K-9 partner, "Ali", conducted an open-air sniff on the currency and received positive alerts for the presence of narcotics odor on both.

16. On October 11, 2023, TFOs Maxwell and Parker transported the currency to the U.S. Marshal Service via Loomis for an official count of, \$131,720.00 in United States Currency.

17. Joseph ZARGAR aka Shahriar Joseph Zargar has an identifiable narcotics criminal history including the following arrests: 2010 - Possession with intent - felony. Joseph ZARGAR stated he owns several ATM machines and sells cars for a living. Joseph ZARGAR did not provide proof of either. A California Secretary of Business search revealed no active businesses registered to Joseph ZARGAR nor would Joseph ZARGAR provide any business information.

18. According to the DEA investigation, neither Joseph ZARGAR or LIVASKANI ever stated to DEA the currency belonged to Brian Zargar. Neither Joseph ZARGAR or LIVASKANI appeared to possess any jewelry while at the airport on or about October 4, 2023.

19. Arthur Artoon LIVASKANI has no identifiable narcotics criminal history. LIVASKANI stated he works for a home health agency but would not provide a name. LIVASKANI denied ownership of the currency found in his possession and stated it belonged to Joseph ZARGAR.

20. On or about March 21, 2024, Princeton Boyd advised a federal financial investigator that Joseph ZARGAR and LIVASKANI flew to Memphis to show Boyd some jewelry for sale. Boyd advised that no jewelry sale was made. Boyd advised that Joseph ZARGAR and


LIVASKANI were interested in purchasing a vehicle and looked at several. Boyd advised they were particularly interested in a white BMW but did not purchase any vehicle because of salvage title. Boyd stated that after the October 2023 seizure, he questioned ZARGAR why ZARGAR provided Boyd's name and number. Boyd stated that ZARGAR said Boyd's name was the first name to come to mind when questioned by DEA.

21. No one is currently incarcerated.

22. Based on the foregoing, I believe that the defendant currency is subject to forfeiture pursuant to drug trafficking proceeds and/or money laundering.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1 day of April, 2024.



KYE MEADOWS, Task Force Officer
Drug Enforcement Administration